

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

THOMAS M. KELLEY,
Plaintiff,

v. Civil Action No. 05-10596-NMG

TOWN OF PLYMOUTH, et al
Defendants.

MOTION FOR PROTECTIVE ORDER
PURSUANT TO RULE 26(c)(1) AND RULE 30(d)(4)
TO LIMIT THE EXAMINATION OF THE
DEPOSITION OF THE PLAINTIFF THOMAS M. KELLEY

Now comes the Plaintiff, and moves this Court for a Protective Order pursuant to Federal Rules of Civil Procedure Rule 26(c) (1) and Rule 30 (d)(4) to limit the examination of the Deposition of the Plaintiff Thomas M. Kelley. In support of this Motion, the Plaintiff relies upon the attached Memorandum of Law and accompanying exhibits.

Respectfully Submitted,
The Plaintiff,
by his attorneys,

/s/ Joseph R. Gallitano
Joseph R. Gallitano, Esq.
BBO # 183700
34 Main Street Ext., Suite 202
Plymouth MA 02360
(508) 746-1500

/s/ Richard D. Armstrong
Richard D. Armstrong, Jr., PC
BBO # 021580
1400 Hancock Street
3rd Floor
Quincy, MA 02169
(617) 471-4400

Dated: September 29, 2006